



"Ashton, David"  
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03/27/2008 05:31 PM

To: Lori Cora/R10/USEPA/US@EPA

cc: Elizabeth McKenna/R10/USEPA/US@EPA, Kristine Koch/R10/USEPA/US@EPA, "Seeger, Andrea"  
<Andrea.Seeger@portofportland.com>

bcc:

Subject: 032708 RE: EPA's draft revision to the Port's 104(e) - 408 settlement communication

Lori, here is our initial thought on how the proposed revised definition of Property would impact us. We would have 39 facilities on the river in the Investigation Area and only 5 would drop out as filled and sold with no known releases. See the PDF (draft subject to review). We would in addition have over 249 properties where we may have had a relationship to the property beyond filling and selling bare land. See the XL summary (our first rough cut based on financial records and subject to further revision). EPA's PRP Search Manual recognizes "potential burden of responding to request" as a basis for relief from the scope of a 104(e) request. Perhaps we could defer investigation of the hinterland properties and focus first on how to get through the 34 riverfront connections listed in the PDF document attached. We will be submitting more contextual information for your consideration. We look forward to discussing this with you further.

David

file: Lwp\104e\epa cor

-----Original Message-----

From: Cora.Lori@epamail.epa.gov [mailto:Cora.Lori@epamail.epa.gov]

Sent: Wednesday, March 26, 2008 10:04 AM

To: Ashton, David

Cc: McKenna.Elizabeth@epamail.epa.gov; Koch.Kristine@epamail.epa.gov

Subject: EPA's draft revision to the Port's 104(e)

Hello, David. As a follow-up to our meeting with the Port on March 13, 2008 regarding the Port's 104(e) Information Request, EPA agreed to consider how the definition of Property could be revised to address the Port's unique circumstances at the harbor. EPA staff has drafted the enclosed changes. The draft change has not been approved by EPA management. Please review these draft changes and call me as soon as possible to discuss. Thanks.

(See attached file: POPRevision032608.doc)

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032708 Updated List of Port River Sites.pdf



032708 Summary Transactions in Investigation Area.xls